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*Attorneys for Marlos L. Chenault  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE:	)	
	)	CHAPTER 11
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	)	
f/k/a General Motors Corp., <i>et al.</i> ,	)	Case No. 09-50026 (MG)
	)	
Debtors.	)	(Jointly Administered)
<hr/>	)	
MARLOS L. CHENAULT and	)	District Court Case No.
SHAYRIKA L. CHENAULT,	)	1:16-cv-03764-RA-JLC
	)	
Appellants,	)	
	)	
v.	)	
	)	
GENERAL MOTORS LLC,	)	
	)	
Appellee.	)	

**STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL**

Appellants Marlos L. Chenault and Shayrika L. Chenault hereby designate the following items for inclusion in the record on appeal to the U.S. District Court for the Southern District of New York:

- Order Approving Sale dated 7/5/2009 (Doc. 2968), with attachments

- Motion for Determination of Applicability of Automatic Stay (Doc. 13611), with attachments
- Objection by General Motors LLC to Motion for Determination of Applicability of Automatic Stay (Doc. 13612), with attachments
- Reply to GM Objection to Motion for Determination of Applicability of Automatic Stay (Doc. 13617), with attachments
- Memorandum Opinion and Order dated 4/15/2016 (Doc. 13618)
- Transcript of the hearing held on April 13, 2016 (Doc. 13631)

The issues on appeal are as follows:

1. The Bankruptcy Court Lacked Jurisdiction to Resolve a State-Law Dispute Between Third Parties that Does Not Involve the Debtor.
2. New GM Assumed Liability for Product Liability Claims of the Type Asserted in the State Court Complaint.

This 1st day of June, 2016.

HARRIS PENN LOWRY LLP

/s/ Jeffrey R. Harris  
Jeffrey R. Harris  
Georgia Bar No. 330315  
Madeline E. McNeeley  
Georgia Bar No. 460652  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing **DESIGNATION OF RECORD ON APPEAL** upon all parties and attorneys of record by filing same with the Court's CM/ECF system.

This 1st day of June, 2016.

HARRIS PENN LOWRY LLP

/s/ Madeline E. McNeeley  
Madeline E. McNeeley  
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